

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CHRIS ANTONIO MEDINA
743 N. Echo
Fresno, CA 93728

Registered Nurse License No. 684453

Respondent

Case No. 2012-167

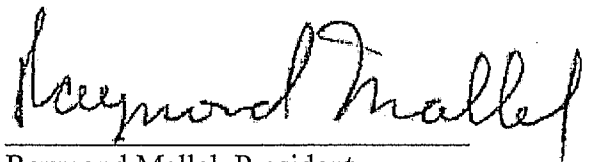
OAH No. 2011120880

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **January 4, 2013.**

IT IS SO ORDERED **December 7, 2012.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
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2 JANICE K. LACHMAN
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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-167

13 **CHRIS ANTONIO MEDINA**

OAH Case No. 2011120880

14 743 N. Echo
Fresno, CA 93728

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15 Registered Nurse License No. 684453

Respondent.

16 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
17 entitled proceedings that the following matters are true:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
20 Registered Nursing. She brought this action solely in her official capacity and is represented in
21 this matter by Kamala D. Harris, Attorney General of the State of California, by Sterling A.
22 Smith, Deputy Attorney General.

23 2. Respondent Chris Antonio Medina (Respondent) is representing himself in this
24 proceeding, and has chosen not to exercise his right to be represented by counsel.

25 3. On or about July 24, 2006, the Board of Registered Nursing issued Registered Nurse
26 License No. 684453 to Chris Antonio Medina (Respondent). The Registered Nurse License was
27 in full force and effect at all times relevant to the charges brought in Accusation No. 2012-167
28 and will expire on July 31, 2014, unless renewed.

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1 Registered Nursing may communicate directly with the Board regarding this stipulation and
2 settlement, without notice to or participation by Respondent. By signing the stipulation,
3 Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the
4 stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this
5 stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of
6 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between
7 the parties, and the Board shall not be disqualified from further action by having considered this
8 matter.

9 11. The parties understand and agree that facsimile copies of this Stipulated Settlement
10 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
11 effect as the originals.

12 12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
15 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
16 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
17 writing executed by an authorized representative of each of the parties.

18 13. In consideration of the foregoing admissions and stipulations, the parties agree that
19 the Board may, without further notice or formal proceeding, issue and enter the following
20 Disciplinary Order:

21 **DISCIPLINARY ORDER**

22 IT IS HEREBY ORDERED that Registered Nurse License No. 684453 issued to
23 Respondent Chris Antonio Medina (Respondent) is revoked. However, the revocation is stayed
24 and Respondent is placed on probation for three (3) years on the following terms and conditions.

25 **Severability Clause.** Each condition of probation contained herein is a separate and
26 distinct condition. If any condition of this Order, or any application thereof, is declared
27 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
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1 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
2 and enforceable to the fullest extent permitted by law.

3 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A
4 full and detailed account of any and all violations of law shall be reported by Respondent to the
5 Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
6 compliance with this condition, Respondent shall submit completed fingerprint forms and
7 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
8 as part of the licensure application process.

9 **Criminal Court Orders:** If Respondent is under criminal court orders, including
10 probation or parole, and the order is violated, this shall be deemed a violation of these probation
11 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

12 2. **Comply with the Board's Probation Program.** Respondent shall fully
13 comply with the conditions of the Probation Program established by the Board and cooperate with
14 representatives of the Board in its monitoring and investigation of the Respondent's compliance
15 with the Board's Probation Program. Respondent shall inform the Board in writing within no
16 more than 15 days of any address change and shall at all times maintain an active, current license
17 status with the Board, including during any period of suspension.

18 Upon successful completion of probation, Respondent's license shall be fully restored.

19 3. **Report in Person.** Respondent, during the period of probation, shall
20 appear in person at interviews/meetings as directed by the Board or its designated representatives.

21 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency
22 or practice as a registered nurse outside of California shall not apply toward a reduction of this
23 probation time period. Respondent's probation is tolled, if and when he resides outside of
24 California. Respondent must provide written notice to the Board within 15 days of any change of
25 residency or practice outside the state, and within 30 days prior to re-establishing residency or
26 returning to practice in this state.

27 Respondent shall provide a list of all states and territories where he has ever been licensed
28 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide

1 information regarding the status of each license and any changes in such license status during the
2 term of probation. Respondent shall inform the Board if he applies for or obtains a new nursing
3 license during the term of probation.

4 **5. Submit Written Reports.** Respondent, during the period of probation,
5 shall submit or cause to be submitted such written reports/declarations and verification of actions
6 under penalty of perjury, as required by the Board. These reports/declarations shall contain
7 statements relative to Respondent's compliance with all the conditions of the Board's Probation
8 Program. Respondent shall immediately execute all release of information forms as may be
9 required by the Board or its representatives.

10 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
11 state and territory in which he has a registered nurse license.

12 **6. Function as a Registered Nurse.** Respondent, during the period of
13 probation, shall engage in the practice of registered nursing in California for a minimum of 24
14 hours per week for 6 consecutive months or as determined by the Board.

15 For purposes of compliance with the section, "engage in the practice of registered nursing"
16 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
17 non-direct patient care position that requires licensure as a registered nurse.

18 The Board may require that advanced practice nurses engage in advanced practice nursing
19 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

20 If Respondent has not complied with this condition during the probationary term, and
21 Respondent has presented sufficient documentation of his good faith efforts to comply with this
22 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
23 extension of Respondent's probation period up to one year without further hearing in order to
24 comply with this condition. During the one year extension, all original conditions of probation
25 shall apply.

26 **7. Employment Approval and Reporting Requirements.** Respondent shall
27 obtain prior approval from the Board before commencing or continuing any employment, paid or
28 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all

1 performance evaluations and other employment related reports as a registered nurse upon request
2 of the Board.

3 Respondent shall provide a copy of this Decision to his employer and immediate
4 supervisors prior to commencement of any nursing or other health care related employment.

5 In addition to the above, Respondent shall notify the Board in writing within seventy-two
6 (72) hours after he obtains any nursing or other health care related employment. Respondent
7 shall notify the Board in writing within seventy-two (72) hours after he is terminated or separated,
8 regardless of cause, from any nursing, or other health care related employment with a full
9 explanation of the circumstances surrounding the termination or separation.

10 8. **Supervision.** Respondent shall obtain prior approval from the Board
11 regarding Respondent's level of supervision and/or collaboration before commencing or
12 continuing any employment as a registered nurse, or education and training that includes patient
13 care.

14 Respondent shall practice only under the direct supervision of a registered nurse in good
15 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
16 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
17 approved.

18 Respondent's level of supervision and/or collaboration may include, but is not limited to the
19 following:

20 (a) Maximum - The individual providing supervision and/or collaboration is present in
21 the patient care area or in any other work setting at all times.

22 (b) Moderate - The individual providing supervision and/or collaboration is in the patient
23 care unit or in any other work setting at least half the hours Respondent works.

24 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
25 person communication with Respondent at least twice during each shift worked.

26 (d) Home Health Care - If Respondent is approved to work in the home health care
27 setting, the individual providing supervision and/or collaboration shall have person-to-person
28 communication with Respondent as required by the Board each work day. Respondent shall

1 maintain telephone or other telecommunication contact with the individual providing supervision
2 and/or collaboration as required by the Board during each work day. The individual providing
3 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
4 patients' homes visited by Respondent with or without Respondent present.

5 **9. Employment Limitations.** Respondent shall not work for a nurse's
6 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a
7 traveling nurse, or for an in-house nursing pool.

8 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
9 registered nursing supervision and other protections for home visits have been approved by the
10 Board. Respondent shall not work in any other registered nursing occupation where home visits
11 are required.

12 Respondent shall not work in any health care setting as a supervisor of registered nurses.
13 The Board may additionally restrict Respondent from supervising licensed vocational nurses
14 and/or unlicensed assistive personnel on a case-by-case basis.

15 Respondent shall not work as a faculty member in an approved school of nursing or as an
16 instructor in a Board approved continuing education program.

17 Respondent shall work only on a regularly assigned, identified and predetermined
18 worksite(s) and shall not work in a float capacity.

19 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
20 request documentation to determine whether there should be restrictions on the hours of work.

21 **10. Complete a Nursing Course(s).** Respondent, at his own expense, shall
22 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later
23 than six months prior to the end of his probationary term.

24 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
25 Respondent shall submit to the Board the original transcripts or certificates of completion for the
26 above required course(s). The Board shall return the original documents to Respondent after
27 photocopying them for its records.
28

1 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
2 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
3 amount of \$2,067.50. Respondent shall be permitted to pay these costs in a payment plan
4 approved by the Board, with payments to be completed no later than three months prior to the end
5 of the probation term.

6 If Respondent has not complied with this condition during the probationary term, and
7 Respondent has presented sufficient documentation of his good faith efforts to comply with this
8 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
9 extension of Respondent's probation period up to one year without further hearing in order to
10 comply with this condition. During the one year extension, all original conditions of probation
11 will apply.

12 12. **Violation of Probation.** If Respondent violates the conditions of his
13 probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside
14 the stay order and impose the stayed discipline (revocation/suspension) of Respondent's license.

15 If during the period of probation, an accusation or petition to revoke probation has been
16 filed against Respondent's license or the Attorney General's Office has been requested to prepare
17 an accusation or petition to revoke probation against Respondent's license, the probationary
18 period shall automatically be extended and shall not expire until the accusation or petition has
19 been acted upon by the Board.

20 13. **License Surrender.** During Respondent's term of probation, if he ceases
21 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
22 probation, Respondent may surrender his license to the Board. The Board reserves the right to
23 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
24 take any other action deemed appropriate and reasonable under the circumstances, without further
25 hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no
26 longer be subject to the conditions of probation.

27 Surrender of Respondent's license shall be considered a disciplinary action and shall
28 become a part of Respondent's license history with the Board. A registered nurse whose license

1 has been surrendered may petition the Board for reinstatement no sooner than the following
2 minimum periods from the effective date of the disciplinary decision:

3 (1) Two years for reinstatement of a license that was surrendered for any reason other
4 than a mental or physical illness; or

5 (2) One year for a license surrendered for a mental or physical illness.

6 14. **Physical Examination.** Within 45 days of the effective date of this
7 Decision, Respondent, at his expense, shall have a licensed physician, nurse practitioner, or
8 physician assistant, who is approved by the Board before the assessment is performed, submit an
9 assessment of the Respondent's physical condition and capability to perform the duties of a
10 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If
11 medically determined, a recommended treatment program will be instituted and followed by the
12 Respondent with the physician, nurse practitioner, or physician assistant providing written reports
13 to the Board on forms provided by the Board.

14 If Respondent is determined to be unable to practice safely as a registered nurse, the
15 licensed physician, nurse practitioner, or physician assistant making this determination shall
16 immediately notify the Board and Respondent by telephone, and the Board shall request that the
17 Attorney General's office prepare an accusation or petition to revoke probation. Respondent shall
18 immediately cease practice and shall not resume practice until notified by the Board. During this
19 period of suspension, Respondent shall not engage in any practice for which a license issued by
20 the Board is required until the Board has notified Respondent that a medical determination
21 permits Respondent to resume practice. This period of suspension will not apply to the reduction
22 of this probationary time period.

23 If Respondent fails to have the above assessment submitted to the Board within the 45-day
24 requirement, Respondent shall immediately cease practice and shall not resume practice until
25 notified by the Board. This period of suspension will not apply to the reduction of this
26 probationary time period. The Board may waive or postpone this suspension only if significant,
27 documented evidence of mitigation is provided. Such evidence must establish good faith efforts
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1 by Respondent to obtain the assessment, and a specific date for compliance must be provided.
2 Only one such waiver or extension may be permitted.

3 15. **Participate in Treatment/Rehabilitation Program for Chemical**
4 **Dependence.** Respondent, at his expense, shall successfully complete during the probationary
5 period or shall have successfully completed prior to commencement of probation a Board-
6 approved treatment/rehabilitation program of at least six months duration. As required, reports
7 shall be submitted by the program on forms provided by the Board. If Respondent has not
8 completed a Board-approved treatment/rehabilitation program prior to commencement of
9 probation, Respondent, within 45 days from the effective date of the decision, shall be enrolled in
10 a program. If a program is not successfully completed within the first nine months of probation,
11 the Board shall consider Respondent in violation of probation.

12 Based on Board recommendation, each week Respondent shall be required to attend at least
13 one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics Anonymous,
14 Alcoholics Anonymous, etc.) and a nurse support group as approved and directed by the Board.
15 If a nurse support group is not available, an additional 12-step meeting or equivalent shall be
16 added. Respondent shall submit dated and signed documentation confirming such attendance to
17 the Board during the entire period of probation. Respondent shall continue with the recovery plan
18 recommended by the treatment/rehabilitation program or a licensed mental health examiner
19 and/or other ongoing recovery groups.

20 16. **Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent
21 shall completely abstain from the possession, injection or consumption by any route of all
22 controlled substances and all psychotropic (mood altering) drugs, including alcohol, except when
23 the same are ordered by a health care professional legally authorized to do so as part of
24 documented medical treatment. Respondent shall have sent to the Board, in writing and within
25 fourteen (14) days, by the prescribing health professional, a report identifying the medication,
26 dosage, the date the medication was prescribed, the Respondent's prognosis, the date the
27 medication will no longer be required, and the effect on the recovery plan, if appropriate.

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1 Respondent shall identify for the Board a single physician, nurse practitioner or physician
2 assistant who shall be aware of Respondent's history of substance abuse and will coordinate and
3 monitor any prescriptions for Respondent for dangerous drugs, controlled substances or mood-
4 altering drugs. The coordinating physician, nurse practitioner, or physician assistant shall report
5 to the Board on a quarterly basis Respondent's compliance with this condition. If any substances
6 considered addictive have been prescribed, the report shall identify a program for the time limited
7 use of any such substances.

8 The Board may require the single coordinating physician, nurse practitioner, or physician
9 assistant to be a specialist in addictive medicine, or to consult with a specialist in addictive
10 medicine.

11 **17. Submit to Tests and Samples.** Respondent, at his expense, shall
12 participate in a random, biological fluid testing or a drug screening program which the Board
13 approves. The length of time and frequency will be subject to approval by the Board.
14 Respondent is responsible for keeping the Board informed of Respondent's current telephone
15 number at all times. Respondent shall also ensure that messages may be left at the telephone
16 number when he is not available and ensure that reports are submitted directly by the testing
17 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately
18 to the Board by the program and Respondent shall be considered in violation of probation.

19 In addition, Respondent, at any time during the period of probation, shall fully cooperate
20 with the Board or any of its representatives, and shall, when requested, submit to such tests and
21 samples as the Board or its representatives may require for the detection of alcohol, narcotics,
22 hypnotics, dangerous drugs, or other controlled substances.

23 If Respondent has a positive drug screen for any substance not legally authorized and not
24 reported to the coordinating physician, nurse practitioner, or physician assistant, and the Board
25 files a petition to revoke probation or an accusation, the Board may suspend Respondent from
26 practice pending the final decision on the petition to revoke probation or the accusation. This
27 period of suspension will not apply to the reduction of this probationary time period.

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1 If Respondent fails to participate in a random, biological fluid testing or drug screening
2 program within the specified time frame, Respondent shall immediately cease practice and shall
3 not resume practice until notified by the Board. After taking into account documented evidence
4 of mitigation, if the Board files a petition to revoke probation or an accusation, the Board may
5 suspend Respondent from practice pending the final decision on the petition to revoke probation
6 or the accusation. This period of suspension will not apply to the reduction of this probationary
7 time period.

8 18. **Mental Health Examination.** Respondent shall, within 45 days of the
9 effective date of this Decision, have a mental health examination including psychological testing
10 as appropriate to determine his capability to perform the duties of a registered nurse. The
11 examination will be performed by a psychiatrist, psychologist or other licensed mental health
12 practitioner approved by the Board. The examining mental health practitioner will submit a
13 written report of that assessment and recommendations to the Board. All costs are the
14 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
15 result of the mental health examination will be instituted and followed by Respondent.

16 If Respondent is determined to be unable to practice safely as a registered nurse, the
17 licensed mental health care practitioner making this determination shall immediately notify the
18 Board and Respondent by telephone, and the Board shall request that the Attorney General's
19 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
20 practice and may not resume practice until notified by the Board. During this period of
21 suspension, Respondent shall not engage in any practice for which a license issued by the Board
22 is required, until the Board has notified Respondent that a mental health determination permits
23 Respondent to resume practice. This period of suspension will not apply to the reduction of this
24 probationary time period.

25 If Respondent fails to have the above assessment submitted to the Board within the 45-day
26 requirement, Respondent shall immediately cease practice and shall not resume practice until
27 notified by the Board. This period of suspension will not apply to the reduction of this
28 probationary time period. The Board may waive or postpone this suspension only if significant,

1 documented evidence of mitigation is provided. Such evidence must establish good faith efforts
2 by Respondent to obtain the assessment, and a specific date for compliance must be provided.
3 Only one such waiver or extension may be permitted.

4 19. **Therapy or Counseling Program.** Respondent, at his expense, shall
5 participate in an on-going counseling program until such time as the Board releases him from this
6 requirement and only upon the recommendation of the counselor. Written progress reports from
7 the counselor will be required at various intervals.

8 ACCEPTANCE

9 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
10 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated
11 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
12 bound by the Decision and Order of the Board of Registered Nursing.

13 DATED: 9/21/12

14 
15 CHRIS ANTONIO MEDINA
16 Respondent

17 ENDORSEMENT

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
19 submitted for consideration by the Board of Registered Nursing of the Department of Consumer
20 Affairs.

21 Dated: 9/21/2012

22 Respectfully submitted,

23 KAMALA D. HARRIS
24 Attorney General of California
25 JANICE K. LACHMAN
26 Supervising Deputy Attorney General

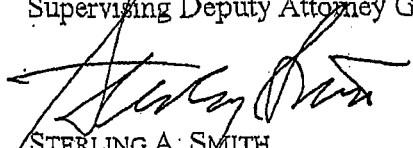
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28 STERLING A. SMITH
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Accusation No. 2012-167

1 KAMALA D. HARRIS
Attorney General of California
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7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2012-167

12 **CHRIS ANTONIO MEDINA**
13 743 N. Echo
Fresno, CA 93728
14 Registered Nurse License No. 684453

A C C U S A T I O N

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
19 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
20 Department of Consumer Affairs.

21 **Registered Nurse License**

22 2. On or about July 24, 2006, the Board issued Registered Nurse License Number
23 684453 to Chris Antonio Medina ("Respondent"). The registered nurse license was in full force
24 and effect at all times relevant to the charges brought herein and will expire on July 31, 2012,
25 unless renewed.

26 **STATUTORY PROVISIONS**

27 3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent
28 part, that the Board may discipline any licensee, including a licensee holding a temporary or an

1 inactive license, for any reason provided in Article 3 (commencing with section 2750) of the
2 Nursing Practice Act.

3 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not
4 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
5 to render a decision imposing discipline on the license. Under Code section 2811, subdivision
6 (b), the Board may renew an expired license at any time within eight years after the expiration.

7 5. Code section 2761 states, in pertinent part:

8 The board may take disciplinary action against a certified or licensed
9 nurse or deny an application for a certificate or license for any of the following:

10 (a) Unprofessional conduct...,

11 (f) Conviction of a felony or of any offense substantially related to the
12 qualifications, functions, and duties of a registered nurse, in which event the record of
the conviction shall be conclusive evidence thereof.

13 6. Code section 2762 states, in pertinent part:

14 In addition to other acts constituting unprofessional conduct within the
15 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a
person licensed under this chapter to do any of the following:

16 (b) Use any controlled substance as defined in Division 10 (commencing
17 with Section 11000) of the Health and Safety Code, or any dangerous drug or
18 dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or
in a manner dangerous or injurious to himself or herself, any other person, or the
public or to the extent that such use impairs his or her ability to conduct with safety to
the public the practice authorized by his or her license.

19 (c) Be convicted of a criminal offense involving the prescription,
20 consumption, or self-administration of any of the substances described in
21 subdivisions (a) and (b) of this section, or the possession of, or falsification of a
record pertaining to, the substances described in subdivision (a) of this section, in
which event the record of the conviction is conclusive evidence thereof.

22 COST RECOVERY

23 7. Code section 125.3 provides, in pertinent part, that the Board may request the
24 administrative law judge to direct a licensee found to have committed a violation or violations of
25 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
26 enforcement of the case.

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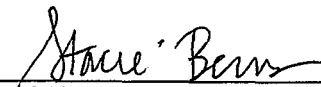
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1 1. Revoking or suspending Registered Nurse License Number 684453, issued to Chris
2 Antonio Medina;

3 2. Ordering Chris Antonio Medina to pay the Board of Registered Nursing the
4 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
5 Professions Code section 125.3; and,

6 3. Taking such other and further action as deemed necessary and proper.
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10 DATED: September 22, 2011

for 
LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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